

67702-25

04/25/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

W. Neudorff GmbH KG
c/o Mr. Walter Talarek, PC
1008 Riva Ridge Drive
Great Falls, VA 22066-1620

APR 25 2013

Dear Mr. Talarek:

Subject: Application for Pesticide Notification (PRN 98-10)
Reformat Pests Controlled section, add existing ant claim to other crops
Neudorff Bug Bait
EPA Reg. No. 67702-25
Your submission dated March 27, 2013

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated March 27, 2013 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds the action requested falls within the scope of PRN 98-10. The labels submitted with the application have been stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions regarding this letter, please contact Dana Pilitt, Ph.D. of my staff at (703) 305-7071 or via e-mail at pilitt.dana@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Suarez", is written over the typed name.

Mark Suarez
Product Manager 13
Insecticide Branch
Registration Division (7505P)

67702-25 D 476936



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

Print Form

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 67702-25	2. EPA Product Manager Mark Suarez	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Neudorff Bug Bait	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) W. Neudorff GmbH KG c/o Walter G. Talarek PC 1008 Riv Ridge Drive Great Falls, VA 22066-1620 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>NOTIFICATION</u> Product Name <u>APR 25 2013</u>

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Notification under PR Notice 98-10 of the reformatting of the "Pests Controlled" section and the addition of certain pests to certain use sites. See the enclosed letter to Mr. Mark Suarez, PM 13, for a full explanation of the amendment and the certification required by PR Notice 98-10.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Walter G. Talarek	Title Authorized Agent	Telephone No. (Include Area Code) 703-730-4837
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Authorized Agent	
4. Typed Name Walter G. Talarek	5. Date March 27, 2013	

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LAW OFFICES OF
WALTER G. TALAREK, PC
1008 Riva Ridge Drive
Great Falls, VA 22066-1620

PHONE: 703-759-4837
FAX: 703-759-4837
E-MAIL: wtalarek@verizon.net
March 27, 2013

DELIVERED BY COURIER

Mark Suarez, PM 13
Registration Division
c/o Document Processing Desk (NOTIF).
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re: Neudorff Bug Bait
EPA Reg. No. 67702-25
Notification

Dear Mr. Suarez:

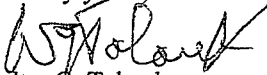
Please find enclosed W. Neudorff GmbH KG's ("Neudorff's") application under PR Notice 98-10 for a notification to the registration of "Neudorff Bug Bait", EPA Reg. No. 67702-25. This notification (1) inserts a "Pests Controlled" section above each Crop table and (2) adds the pests "Ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)" to the Pests Controlled section for the "Fruits including Citrus", and "Tree Nuts and Peanuts and Pistachios" Crop tables of the label. Please note that ants are already listed for the Turf and Ornamentals section of this product's label. Further, ants are approved for most of these crops on the label of a product that is substantially similar in composition to the Neudorff Bug Bait, i.e., Neudorff Bug Bait – Residential, EPA Reg. No. 67702-28.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR § 152.46, and no other change have been made to the labeling or confidential statement of formula of this product. I understand that it is a violation of 18 USC Section 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with PR Notice 98-10 and 40 CFR § 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Two (2) copies of the revised label are enclosed. One of these labels has the revisions being made by this notification highlighted in yellow to assist you with your review.

Please feel free to contact me if you have any questions about this application.

Sincerely yours,


Walter G. Talarek
Authorized Agent

Enclosure – Application for Notification

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NEUDORFF BUG BAIT

Active Ingredient:	By weight
Spinosad (a mixture of spinosyn A and spinosyn D)	0.07%
Other Ingredients:	99.93%
Total	100.00%

NOTIFICATION

APR 25 2013

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. [For emergency information concerning this product, call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site: www.npic.orst.edu) [alternately insert subregistrants toll free number and hours of operation]. During other times, call the poison control center 1-800-222-1222.]

NET WEIGHT 10 lbs, 20 lbs, 25 lbs, 40 lbs, 45 lbs, 50 lbs, 55 lbs (25 kg), 1984 lbs (900 kg), 2000 lbs, 2011 lbs (912 kg) and 2116 lbs (960kg)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: CAUTION. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

PERSONAL PROTECTIVE EQUIPMENT (PPE) REQUIREMENTS: Applicators and other handlers must wear: long-sleeved shirts and long pants; and shoes plus socks. Follow manufacturer's instructions for maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS: This product is toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a manner that will contact workers or other persons, either directly or through drift. Only protected workers may be in the area during application. For any requirements specific to your State or Tribe, consult the State or Tribal agency representative responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE) and the restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (WPS).

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

- Coveralls
- Waterproof gloves
- Shoes plus socks

APPLICATION DIRECTIONS

HOW TO APPLY: Spread the bait on the soil around or near the plants to be protected. For broadcast application, use standard broadcast spreaders. For row application, use standard granular spreaders. Apply at the higher rate if the infestation is severe. Reapply after heavy rain or watering. Reapply as the bait is consumed or at least every 2 to 4 weeks. Do not apply more than 3 times in any 30 day period.

Do not place in piles. If the ground is dry, wet it before applying bait. The product works best when soil is moist but with little or no standing water. See specific directions for different use sites.

Neudorff Bug Bait contains 0.0007lbs of spinosad per lb. Use the following table to assist in calculating applied a.i. per acre.

APPLICATION RATE REFERENCE TABLE:

Application Rate of Neudorff Bug Bait	Active Ingredient Equivalent (lb ai/acre)
20 lbs/acre	0.014
25 lbs/acre	0.0175
30 lbs/acre	0.021
35lbs/acre	0.0245
40lbs/acre	0.028
44lbs/acre	0.0308

BERRIES: Spread the bait around the perimeter of the plot to intercept pests migrating towards the berries. If pests are already in the plots, then carefully spread bait between the furrows near the base of the plants. For small plots, treat around the base of the plants to be protected. Do not spread over the entire area but apply selectively. Use the higher rate for heavy infestations.

Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

PESTS CONTROLLED: earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Bushberries (blueberry, currant, elderberry, gooseberry, huckleberry, juneberry, lionberry, salal)	Do not make more than 6 applications per calendar year or more than 3 applications per crop.	Do not make applications less than 6 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Caneberries (blackberry, loganberry, red and black raspberry)	Do not make more than 6 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within one day of harvest.	Do not apply more than a total 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Cranberry	Do not make more than 6 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply within 21 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Strawberry	Do not make more than 5 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.

FRUITS INCLUDING CITRUS: Apply in orchards using standard fertilizer granular spreaders. For seedlings, spread the bait around the base of the stem. Apply at 0.15 oz., or 1 level teaspoon, per square yard, in a 6 inch circular band around the base of the plants to be protected. For older trees, spread the bait around the base of the trees to intercept pests traveling to the trunk. Use the higher rates for heavy infestations. Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

PESTS CONTROLLED: Ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Banana and plantain	Do not make more than 6 applications per calendar year or more than 4 applications per crop.	Do not make applications less than 7 days apart.	Do not apply within 8 weeks of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.

Citrus (grapefruit, lemons, limes, oranges, tangerines)	Do not make more than 3 applications per calendar year.	Do not make applications less than 6 days apart	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Fig	Do not make more than 4 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Grape	Do not make more than 5 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad per acre per season west of the Rocky Mountains, and no more than 0.36 lb ai spinosad per acre per season east of the Rocky Mountains.
Pome fruits (apples, crabapple, loquat, mayhaw, pears, quince)	Do not make more than 4 applications per calendar year.	Do not make applications less than 10 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Stone fruits – cherries, plums, prunes		Do not make applications less than 7 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Stone fruits – peaches, nectarines, apricots		Do not make applications less than 7 days apart.	Do not apply within 14 days of harvest for apricots or within 1 days of harvest for nectarines and peaches.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Tropical Tree fruits (avocado, guava, mango, papaya, passionfruit)	Do not make more than 2 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.

VEGETABLES: Scatter the bait around the perimeter of the vegetable plantings to provide a protective "barrier" for pests entering the vegetable plantings. If pests are inside the rows, then scatter the bait on the soil around the plants and between the rows. Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).
PESTS CONTROLLED: earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Artichoke	Do not make more than 4 applications per crop.	Do not make applications less than 7 days apart.	Do not apply within 2 days of harvest.	Do not apply more than a total of 0.33 lb ai spinosad (including foliar uses) per crop.
Asparagus (For post harvest protection of ferns only)	Do not make more than 3 applications per crop.	Do not make applications less than 4 days apart.	Do not apply within 60 days of spear harvest.	Do not apply more than a total of 0.28 lb ai spinosad (including foliar uses) per crop. Do not feed treated ferns to meat or dairy animals.
Legume vegetables (succulent and dried beans and peas)	Do not make more than 6 applications per crop.	Do not make applications less than 5 days apart.	Succulent beans and peas: Do not apply within 3 days of harvest. Dried beans and peas: Do not apply within 28 days of harvest.	Succulent beans and peas: Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per season. Dried beans and peas: Do not apply more than a total of 0.188 lb ai spinosad per acre per season.
Bulb vegetables (dry bulb onion, garlic, great-headed (elephant) garlic, green onion, leek, shallot, welch onion)	Do not make more than 5 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar and seed uses) per acre per crop.

Cole crops (broccoli, broccoli raab, Brussels sprouts, cabbage, cauliflower, cavalo, Chinese broccoli, Chinese cabbage (bok choy), Chinese cabbage (napa), Chinese mustard cabbage (gai choy), collards, kale, kohlrabi, izuna, mustard greens, mustard spinach, rape greens)	Do not make more than 6 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop. Do not apply to seedling cole crops grown for transplant.
Corn – field corn	Do not make more than 3 applications per calendar year.		Do not apply within 28 days of harvest for grain or fodder; 7 days for forage.	Do not apply more than a total of 0.188 lb ai spinosad (including foliar uses) per acre per year.
Corn – sweet corn	Do not make more than 6 applications per calendar year.		Do not apply within one day of harvest for grains; 7 days for forage, 28 days for fodder.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Cucurbits (cucumber, edible gourds, melons, muskmelons, cantaloupe, honeydew, pumpkin, summer squash, watermelon, winter squash)	Do not make more than 6 applications per crop.	Do not make applications less than 5 days apart.	Do not apply within one day of harvest for cucumber; 3 days for other cucurbits.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar and seed uses) per acre per season.
Fruiting vegetables (eggplant, groundcherry, pepino, pepper (except black), tomatillo, tomato) and okra	Do not make more than 6 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop. Do not apply to seedling fruiting vegetables and okra grown for transplant within a greenhouse, shade house, or field plot.

Leafy vegetables (except Brassica) and leaves of root and tuber and legume vegetables (arugula, beets, celery, peas, lettuce, rhubarb, spinach, swiss chard), turnip greens, and watercress	Do not make more than 6 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest for leafy vegetables and watercress; 3 days for leaves of root, tuber and legume vegetables.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar and seed uses) per acre per crop. Do not apply to seedling leafy crops grown for transplant within a greenhouse or shade house.
Potatoes, ginger, sweet potatoes, yams	Do not make more than 4 applications per crop.	Do not make applications less than 7 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.33 lb ai spinosad (including foliar uses) per crop.
Root vegetables – Carrot, parsnip	Do not make more than 4 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.3 lb ai spinosad (including foliar uses) per acre per crop.
Root vegetables – Radish, rutabaga, turnip	Do not make more than 3 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.28 lb ai spinosad (including foliar uses) per acre per crop.
Root and Tuber Vegetables (beets, sugarbeets)	Do not make more than 4 applications per crop.	Do not make applications less than 7 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.33 lb ai spinosad (including foliar uses) per acre per crop.
Soybean	Do not make more than 4 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within 28 days of harvest.	Do not apply more than a total of 0.186 lb ai spinosad (including foliar uses) per acre per year. Do not feed treated forage or hay to meat or dairy animals.

TREE NUTS, PEANUTS AND PISTACHIOS: For seedlings spread the bait around the base of the stem. For older trees, spread around the base of the trees to intercept pests traveling to the trunk. Use the higher rates for heavy infestations. Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

PESTS CONTROLLED: Ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Peanut (not for use in California)	Do not make more than 3 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply within 3 days of nut harvest or 14 days of forage.	Do not apply more than a total of 0.28 lb ai spinosad (including foliar uses) per acre per crop. Do not allow grazing of crop residue or harvest of crop residue for hay until 14 days after the last application.
Tree nuts (almond, cashew, chestnut, filbert (hazelnut), macadamia nut, pecan, walnut); Pistachios		Do not make applications less than 7 days apart	Do not apply within 1 day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.

HERBS: At the seedling and later stages, apply the bait between the rows and around the perimeter of the field. Use the higher dosage for heavy infestations. Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

PESTS CONTROLLED: earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Herbs (angelica, balm, basil, borage, burnet, chamomile, catnip, chervil (dried), chive, chive (Chinese), cilantro (leaf), clary, coriander (leaf), costmary, cilantro, curry (leaf), dillweed, horehound, hyssop, lavender, lemongrass, lovage (leaf), marigold, marjoram, nasturtium, parsley (dried),	Do not make more than 5 applications per calendar year or more than 3 applications per crop.	Do not make applications less than 5 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.47 lb ai spinosad (including foliar uses) per acre per crop.

pennyroyal, rosemary, rue, sage, savory (summer and winter), sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood)				
Peppermint and spearmint	Do not make more than 4 applications per calendar year or more than 3 applications per crop.	Do not make applications less than 4 days apart.	Do not apply within 7 days of harvest	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.

GRASS GROWN FOR SEED PRODUCTION AND CEREAL GRAINS: When pests are detected, scatter the bait by hand or with a granular spreader. Use the higher rate for heavy infestations. Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

PESTS CONTROLLED: earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Small cereal grains (barley, buckwheat, grain amaranth, milo, oats, pearl millet, proso millet, rye, sorghum, triticale, wheat).	Do not make more than 3 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within 3 days of harvest for forage, fodder or hay. Do not apply within 21 days of harvest for grain or straw.	Do not apply more than a total of 0.28 lb ai spinosad (including foliar uses) per acre per year.
Grass crops, grass grown for seed, pastures and rangeland	Do not make more than 6 applications per season.	No preharvest interval for forage.	Do not use within 3 days of harvest for hay or fodder.	Do not apply more than a total of 0.186 lb ai spinosad (including foliar uses) per acre per season.

TURF AND ORNAMENTALS: When pests are detected, broadcast the bait by hand or with a granular spreader. Alternatively, in or around plant pots on greenhouse benches, or in or around container-grown plants apply at 0.15 oz., or 1 level teaspoon, per square yard, in a 6 inch circular band around the base of the plants to be protected. Use the higher rate for heavy infestations. Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

PESTS CONTROLLED: Ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Additional Restrictions
Turf (lawns, athletic field and recreational areas, commercial turf, sod, golf courses, and grass		Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per

buffers around gardens, crop areas and ornamentals)			year.
Outdoor Ornamentals (herbaceous and woody plants)		Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Greenhouse Ornamentals	Do not make more than 10 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Outdoor container-grown nursery plants		Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Tree Farms and Plantations (Conifers, including Christmas trees, and deciduous trees)	Do not make more than 6 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Non-crop areas (pastures, rangeland, forests, parks, playgrounds, cemeteries, picnic areas, roadsides, campgrounds, industrial sites, fallow land, barrier strips and buffer zones)			

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty drum, bag, box or tote into application equipment by shaking and trapping sides and bottom to loosen clinging particles. Then offer for recycling, if available, or dispose of empty drum, bag, box or tote in a sanitary landfill, or by incineration, or by other procedures allowed by State and local authorities.

BATCH CODE

[The registrant may use one or both of these two optional statements, either:

"WARRANTY



To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated on this label only when used in accordance with directions under normal use conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. To the extent consistent with applicable law, seller makes no other warranties, either expressed or implied."

or

"OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product or refund your money. Simply send your name, address and proof of purchase to [insert name and address of supplemental registrant]."

]

[The following claims and product information may or may not be presented on the product's label and labeling:

- Quick Facts
- Product Facts
 - What it does: Kills insects
 - Where to Use: For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, gardens and in greenhouses
- Read the Label First!
- **NOTE:** This package is sold by weight. Contents may have settled during shipment.
-  For Organic Gardening
-  For Organic Production
- Neudorff Bug Bait may be used as part of an Integrated Pest Management (IPM) program or for organic production.
- Patent Pending
- This container is made from XX% recycled materials.
- The highly compressed granules (pellets) are easy to use, clean to handle and economical.
- Patented technology.
- Patented insect killer
- Patented formula.
- Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.
- Easy to apply granules (pellets).
- Pellets
- Kills insects.
- INSECT BAIT
- INSECT (BAIT) (PELLETS)
- Kills (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants,) (earwigs,) (cutworm)
- Spinosad is derived from the fermentation of a naturally occurring soil dwelling organism.
- Treats (will treat) x,xxx sq. ft.
- 1 lb treats 2000 ft²
- Effective for up to 4 weeks.
- Lasts up to 4 weeks.
- Remains effective for up to 4 weeks.
- The highly compressed easy-to-apply granules can be effective up to four (4) weeks.
- Neudorff Bug Bait contains spinosad derived from naturally occurring soil dwelling bacterium in a patented granular formulation that requires no mixing, spraying, or special applicators.
- Proven insect (killer) (kill) (control).
- Convenient. Easy-to-use. Requires no mixing, spraying, or special applicators.
- **SATISFACTION GUARANTEED.**

- Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.
- Can be used in vegetable gardens.
- Ideal for vegetable gardens.
- For use around listed vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, gardens, and in greenhouses.
- For use on lawns, commercial turf, recreational areas, and golf courses
- Use around flowers, gardens, and fruit trees.
- Use around turf and ornamentals
- Can be used around turf, ornamentals, and non-crop areas
- Read Entire Container Label Before Using This Product.
- Unconditionally guaranteed by [insert name of supplemental registrant].
- Baits and Kills
- Effective against a wide variety of insects.
- Lures insects from hiding places and plants.
- Attracts and kills insects
- Attracts and kills
- For control (or suppression) of (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), (earwigs), (cutworm)
- Contains Spinosad
- www.neudorff.de
- Manufactured under a license of W. Neudorff GmbH KG, Germany.



- Evening is the best time to apply the bait as pests travel and feed mostly by night or early morning.
- Ant Bait (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)
- Ant Killer (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)
- Controls foraging ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)
- Controls common household ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)
- Can be used on listed household ants around the home
- Cutworm Bait
- Cutworm Killer
- Earwig Bait
- Earwig Killer
- Earwig and Cutworm Killer
- Earwig and Cutworm Bait
- Ant, Earwig and Cutworm Killer
- Ant, Earwig and Cutworm Bait
- Neudorff Bug Bait is a soil-applied granular insecticidal bait containing the active ingredient spinosad that attracts and kills insects, including ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), earwigs and cutworms in commercial agricultural crops, ornamentals, herbs, seed crops and lawns.
- Listed by the Organic Materials Review Institute (OMRI) for use in organic production.
- OMRI Listed
- See inside panels for additional Directions for Use
- See inside booklet for additional precautionary statements and complete directions for use
- see inside panels for additional precautionary statements and directions for use



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EPA Registration #67702-25

EPA Establishment #67702-DEU-2

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,
D-31860 Emmerthal, Germany
011-49-5155-624-100
[www.neudorff\[pro\].com](http://www.neudorff[pro].com)
[in the alternative, the distributor's telephone number and website address may be used]